REMARKS

The Office Action dated December 1, 2005 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response to the Office Action.

Claims 30, 37-39, 46-48 and 53 are amended to particularly point out and distinctly claim the subject matter of the present invention. No new matter is added. Claims 30-54 are respectfully submitted for consideration

The Office Action rejected claims 30-54 under 35 U.S.C. 103(a) as being obvious over US Patent No. 6,571,092 to Faccin et al. (Faccin), in view of US Patent No, 5,095,480 to Fenner (Fenner). The Office Action took the position that Faccin disclosed all of the features of the above claims except for the feature of storing a node address of any preceding node. The Office Action asserted that Fenner disclosed this feature. Applicants respectfully submit that the cited references, taken individually or in combination, fail to disclose or suggest all of the features of any of the pending claims.

Claim 30, from which claims 31-38, 42 and 45 depend, recites a method for enabling a call-back from an entity to an user equipment initiating a session. When the user equipment initiates a session, the user equipment sends a session setup message for initiating the session to a first node, wherein the first node stores a first record for the user equipment for a predetermined time, the first record including an address and an identity of the user equipment and the first node forwards the session setup message to a second node. The second node stores a second record for the user equipment for a predetermined

time which second record includes the address of the first node and the identity of the user equipment and the second node forwards the session setup message to a third node or an emergency center. The third node or the emergency center stores a third record for the user equipment for a predetermined time which third record includes the address of the second node and the identity of the user equipment. In case of a call-back, the entity comprises the third node or the emergency center and uses the stored identity of the user equipment to find and in the third record the address of the second node and the third node or the emergency center sends to the second node a message related to the call-back which includes the identity of the user equipment. The second node uses the user equipment identity included in the message, received from the third node related to the call-back to find in the second record the address of the first node and the second node sends to the first node a message related to the call-back includes the identity of the user equipment. In the present method the first node uses the user equipment identity included in the message received from the second node related to the call-back to find in the first record an address of the user equipment and the first node sends to the user equipment a session initiation message.

Claim 39, from which claims 40-44, 46 and 47 depend, a system including first and second nodes and a third node or an emergency center and an user equipment for enabling a call-back from the third node or the emergency center to an user equipment initiating a session. When the user equipment initiates a session, the user equipment sends a session setup message for initiating the session to a first node, wherein the first

node stores a first record for the user equipment for a predetermined time which includes an address and an identity of the user equipment and the first node forwards the session setup message to the second node. The second node stores a second record for the user equipment for a predetermined time which second record includes the address of the first node and the identity of the user equipment and the second node forwards the session setup message to the third node or the emergency center. The third node or the emergency center stores a third record for the user equipment for a predetermined time which includes the address of the second node and the identity of the user equipment. In case of a call-back, the third node or the emergency center uses the stored identity of the user equipment to find in the third record the address of the second node and the third node or the emergency center sends to the second node a message related to the call-back which includes the identity of the user equipment. In the present system the second node uses the user equipment identity included in the message received from the third node related to the call-back to find in the second record the address of the first node and the second node sends to the first node a message related to the call-back which includes the identity of the user equipment. The first node uses the user equipment identity included in the message received from the second node related to the call-back to find in the first record an address of the user equipment and the first node sends to the user equipment a session initiation message.

Claim 48, from which claims 49-52 depend, recites a node in a system comprising first and second nodes and a third node or an emergency center and an user equipment for

enabling a call-back from the third node or the emergency user equipment to an user equipment initiating a session and wherein, when the user equipment initiates a session, the user equipment sends a session setup message for initiating the session to a first node. The first node stores a first record for the user equipment for a predetermined time which includes an address and an identity of the user equipment and the first node forwards the session setup message to the second node. The second node stores a second record for the user equipment for a predetermined time which includes the address of the first node and the identity of the user equipment and the second node forwards the session setup message to the third node or the emergency center. The third node or the emergency center stores a third record for the user equipment for a predetermined time which includes the address of the second node and the identity of the user equipment. In case of a call-back, the third node or the emergency center uses the stored identity of the user equipment to find in the third record the address of the second node and the third node or the emergency center sends to the second node a message related to the call-back including the identity of the user equipment. The second node uses the user equipment identity included in the message received from the third node related to the call-back to find, in the second record, the address of the first node and the second node sends to the first node a message related to the call-back including the identity of the user equipment. The first node uses the user equipment identity included in the message received from the second node related to the call-back to find in the first record an address of the user equipment, and the first node sends to the user equipment, a session initiation message.

The node includes a means for storing the record for the user equipment. The node further includes means for generating and forwarding the session message to another node or the emergency center.

Claim 53, from which claim 54 depends, recites an emergency center in a system comprising first and second nodes and the emergency center and an user equipment for enabling a call-back from the emergency user equipment to an user equipment initiating a session. When the user equipment initiates a session, the user equipment sends a session setup message for initiating the session to a first node. The first node stores a first record for the user equipment for a predetermined time which includes an address and an identity of the user equipment and the first node forwards the session setup message to the second node. The second node stores a second record for the user equipment for a predetermined time which includes the address of the first node and the identity of the user equipment and the second node forwards the session setup message to the emergency center. The emergency center stores a third record for the user equipment for a predetermined time which includes the address of the second node and the identity of the user equipment, in case of a call-back the emergency center uses the stored identity of the user equipment to find in the third record the address of the second node and the emergency center sends to the second node a message related to the call-back including the identity of the user equipment. The second node uses the user equipment identity included in the message received from the third node related to the call-back to find in the second record the address of the first node and the second node sends to the first node a

message related to the call-back including the identity of the user equipment. The first node uses the user equipment identity included in the message received from the second node related to the call-back to find in the first record an address of the user equipment and the first node sends to the user equipment, a session initiation message. The emergency center includes means for storing the record for the user equipment. The emergency center further includes means for receiving the session message from the second node.

Applicants respectfully submit that the pending claims recite features that are neither disclosed nor suggested in any of the cited references.

Faccin is directed to a technique for enabling a callback by a called party, by allocating a temporary identity to the terminal and then allocating an IP address to the terminal and storing the association between the temporary identity and the allocated and stored IP address. A "call back number" (CBN) is allocated to the mobile terminal.

Fenner is directed to a message routing system using a location-independent message format. A unique identification code of a receiving station is contained in the message format. Fenner further describes a network node that stores the source address of the a new node in a route record. A "learned route logic" keeps track of the source addresses of the various nodes transmitting information concerning a particular identification code, and causes a destination routing table to delete old source nodes as destinations, and further causes the destination routing table to add the addresses of the new nodes as the destination.

Applicants respectfully submit that the cited references fail to disclose or suggest all of the features recited in any of the pending claims. Specifically, the cited references fails to disclose or suggest at least the feature of a first, second and third nodes that store respectively, first, second and third records, as recited in claims 30, 39, 48, and 53. The Office Action admits that Faccin fails to disclose these features, which are allegedly disclosed in Fenner. However, Applicants respectfully submit that Fenner fails to cure the admitted deficiencies of Faccin.

Fenner does not disclose or suggest at least the feature of storing a plurality of records in a plurality of nodes that include the addresses of at least one of the plurality of previous nodes. Instead, Fenner merely describes a plurality of nodes that at best determines if it has stored the address of the last node communicating with the ship. See Fenner at column 8 lines 28-34.

Further, Applicants respectfully submit that there is no motivation in the cited references to combine the references as alleged in the Office Action. To establish prima facie obviousness, there must be some suggestion or motivation, either in the references themselves or in knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the references teachings. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Applicants respectfully submit that there isn't any motivation for the cited combination of references in either of Faccin or Fenner. As stated above Faccin is directed to an emergency call-back system, and Fenner is directed to a message routing system using a location-independent message format. Thus, the cited combination of references that is used to form the basis for rejecting the pending claims is the result of impermissible hindsight, because the only motivation to do so is found in Applicants' disclosure.

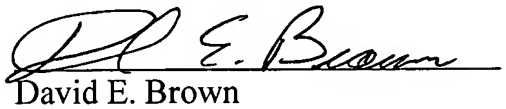
Applicants respectfully submit that because claims 31, 38, 40-47, 49-52 and 54 depend from claims 30, 39, 48, and 53 these claims are allowable at least for the same reasons as claims 30, 39, 48, and 53 as well as the additional features recited in these dependent claims.

Based at least on the above, Applicants respectfully submit that the cited references taken individually or in combination, fail to disclose or suggest all of he features recited in any of the pending claims. Accordingly, withdrawal of the rejection of claims 30-54 under 35 U.S.C. 103(a) as respectfully requested.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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Enclosures: Petition for Extension of Time
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